## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JAMILLA CLARK and ARWA AZIZ, on Behalf of Themselves and Others Similarly Situated, and TURNING POINT FOR WOMEN AND FAMILIES,

Plaintiffs,

-against-

CITY OF NEW YORK,

Case No.: 18-cv-02334 (AT)(KHP)

Defendant.

PLEASE TAKE NOTICE that upon the Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of the Settlement, the Declaration of O. Andrew F. Wilson dated April 5, 2024 and exhibits thereto, the Declaration of Tiffaney Janowicz dated April 4, 2024 and exhibits thereto, and upon all prior pleadings, Plaintiffs, by their counsel Emery Celli Brinckerhoff Abady Ward & Maazel LLP ("ECBAWM") and the Surveillance Technology Oversight Project ("S.T.O.P.") will move this Court at the United States Courthouse, 500 Pearl Street, New York, New York, before the Honorable Analisa Torres, United States District Judge, for an Order:

- (i) Granting preliminary approval of the class settlement dated April 4, 2024;
- (ii) Approving Rust Consulting, Inc. to serve as the class administrator;
- (iii) Approving the form, content and manner of notice to the settlement class and authorizing notice to be distributed in that manner and authorizing the form and content of the claim form;

- (iv) Ordering the payment of the costs of notice and administration to the class administrator pursuant to the terms and conditions set forth in the settlement;
- (v) Setting a hearing date for consideration of final approval of the settlement, service awards to Plaintiffs Jamilla Clark and Arwa Aziz and to class members deposed as part of absent class discovery, and class counsel's application for attorneys' fees and expenses; and
- (vi) Granting such other and further relief as may be just and proper.

Dated: April 5, 2024 New York, New York

> EMERY CELLI BRINCKERHOFF ABADY WARD & MAAZEL LLP

By: /s/
O. Andrew F. Wilson
Matthew D. Brinckerhoff
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SURVEILLANCE TECHNOLOGY OVERSIGHT PROJECT Albert Fox Cahn David Alfasi Siffert c/o Urban Justice Center 40 Rector Street Ste 9th Floor New York, New York 10006

Attorneys for Plaintiff Class